SECTION 6

Wetlands—Only Practicable Alternative Finding

This section describes the project's wetland impacts and whether there is a practicable alternative which avoids the wetland impacts. This section also describes the proposed measures to minimize harm to wetlands in locations where wetlands cannot be avoided and also describes the conceptual plan to compensate for unavoidable wetland impacts.

Basis for Finding

Presidential Executive Order 11990, Protection of Wetlands, requires federal agencies to avoid to the extent practicable long- and short-term adverse impacts associated with the destruction or modification of wetlands. More specifically, the Order directs federal agencies to avoid new construction in wetlands unless there is no practicable alternative and, where wetlands cannot be avoided, the proposed action must include all practicable measures to minimize harm to the wetlands. The following information sets forth the basis for a finding of no practicable alternative to wetland impacts associated with the recommended alternative, and to demonstrate the proposed improvements will include all practicable measures to minimize harm to affected wetlands.

Alternatives

Wetlands in the study area are generally found along small creeks and drainageways, and have been affected by farming or grazing practices (see Aerial Photo Exhibit). Five wetland areas are located within the area of effect of the project's reasonable range of alternatives. An objective of the alternatives development and refinement process was to minimize the amount of wetland loss and to be certain potential impacts could be mitigated in instances where wetland impacts are unavoidable.

No Action Alternative

The No Action Alternative is defined as no capacity improvements except for normal pavement and bridge maintenance, spot traffic operational improvements, and safety improvements would be made to the existing highway. The existing road network's physical design and capacity limitations would remain unchanged. As such, this alternative would require no wetland encroachment.

Recommended Alternative

The recommended alternative is described in detail in Section 2. This alternative includes a 2 lane bypass east of Viroqua (Alternatives S-2 and C-4), expanding existing USH 14 between Westby and Viroqua to a 4-lane divided highway, and a 2-lane bypass west of Westby (Alternative N-4). The recommended alternative would affect a total of approximately

0.8 hectare (2 acres) of wetland. Alternative S-2 (bypass east of Viroqua) would affect 0.16 ha (0.4 acre) of a Wooded Swamp (WS)/ Scrub Shrub (SS) wetland and Alternative N-4 (bypass west of Westby) would affect 0.6 ha (1.5 acres) of a Wet Meadow (M) wetland. Wetland impacts associated with the recommended alternative and other reasonable alternatives are found in Section 4.

Determination of No Practicable Alternative

The recommended alternative was selected as the most practicable alternative based on engineering and environmental evaluation, public input, and agency coordination. As noted in the Impact Summary Table (Exhibit S-1), the level of socioeconomic and environmental impacts associated with the recommended alternative is comparable to the other reasonable alternatives. After evaluating public and agency input, WisDOT selected the recommended alternative because it provides the best long-term transportation service for Vernon County and the Westby and Viroqua communities. It also provides the best balance among social, economic, and natural resource impacts, and is fully consistent with local transportation objectives. The recommended alternative received the most public support, and is not opposed by state and federal review agencies.

No Action Alternative

The No Action Alternative was eliminated from consideration because it would fail to meet the project's purpose and need objectives. Key reasons are discussed in detail in Section 2, and are summarized as follows:

- The No Action Alternative would not address the forecasted need for additional traffic capacity on USH 14/61 and would not reduce the volume of heavy truck traffic in downtown Westby and Viroqua.
- Under the No Action Alternative, safety concerns on USH 14/61 in Westby and Viroqua are expected to increase with growing through traffic traveling through the downtown areas.

Build Alternatives

The Build Alternatives are discussed in detail in Section 2. These alternatives use a combination of new and existing roadway links to provide additional traffic capacity and include alignment options in the project's southern, central and northern sections. Alternatives S-2 and C-4 represent the east Viroqua bypass, and Alternatives S-1 and C-5 represent the west Viroqua bypass. Alternatives C-4/C-5 follow the common alignment on existing USH 14/61 between Viroqua and Westby. Alternatives N-3, N-4 and N-7 represent bypass routes west of Westby.

Alternatives S-1 and C-5 (West Viroqua Bypass)

Although the west Viroqua Bypass (Alternatives S-1 and C-5) addressed the overall need for proposed improvements relative to existing and future traffic demand, safety, system linkage and route importance, and existing highway deficiencies, it would not provide an improvement level comparable to the east Viroqua bypass. The west Viroqua bypass would affect approximately 0.5 hectare (1.1 acres) of wetland, which is more than the wetland

acreage affected by the east Viroqua Bypass Alternative (0.16 hectare or 0.4 acre). This Alternative was eliminated from further consideration for the reasons discussed in detail in Section 2, and summarized as follows:

- Because the west Viroqua bypass would not provide efficient access to the Viroqua Industrial Park and new development at the USH 14/61 and CTH BB intersection, it may remove fewer trucks from downtown Viroqua than the east bypass. As a result, this alternative may not be as effective as the east bypass in reducing conflicts between through and local traffic, improving pedestrian and school bus safety, and improving emergency services in Viroqua.
- This alternative also uses a 4-kilometer (2.5-mile) segment of Springville Road, a rural two-lane road that would require substantial improvement to safely accommodate traffic to the industrial park. With the west Viroqua bypass, traffic volumes past Viroqua High School (located on STH 56) would increase resulting in potential conflicts between high school traffic and other traffic on the bypass.
- The west Viroqua Bypass Alternative would acquire 62.1 hectares (153.5 acres) of farmland, all from private property, and sever 13 farms. The NRCS rated the farmland along the west Viroqua bypass slightly higher than along the east bypass (See Exhibit 4-C for more information).
- The estimated construction cost for the west Viroqua Bypass Alternative, which is 7.1 miles long, is $23.4 million and requires 79.4 hectares (196 acres) of new right-of-way.

Alternative N-3 (Westby Bypass)

Westby Bypass Alternative N-3 would affect approximately 0.6 hectare (1.5 acres) of wetland, the same as Bypass Alternatives N-4 and N-7. Although this alternative addressed the overall project need for proposed improvements and provided similar service to Westby as compared to Alternatives N-4 and N-7, it was eliminated from further consideration due to the key reasons discussed in detail in Section 2, and summarized as follows:

- Alternative N-3 would increase traffic volumes on Tristate Road, and create conflicts between faster moving through traffic and slower moving school buses and farm machinery that use the road.
- Alternative N-3 would displace one residence and no businesses.
- Alternative N-3 would acquire 25.1 hectares (62 acres) of agricultural land and sever 4 farms. The NRCS rated the farmland along Alternative N-3 higher than the other Westby Bypass Alternatives (See Exhibit 4-C for more information).
- The estimated construction cost for Alternative N-3, which is 3.7 miles long, is $8.8 million, and it requires 25.9 hectares (64 acres) of new right-of-way.

Alternative N-7 (Westby Bypass)

Westby Bypass Alternative N-7 would affect approximately 0.6 hectare (1.5 acres) of wetland, the same as Bypass Alternatives N-3 and N-4. Although this alternative also addressed the overall project need for proposed improvements and provided similar service to Westby as compared to Bypass Alternatives N-3 and N-4, it was eliminated from further

consideration due to the following key reasons:

- Alternative N-7 provides a less direct connection between USH 14/61 southwest of Westby and the project terminus near Cut-A-Cross Road resulting in increased travel times and greater energy use than the recommended alternative.
- Alternative N-7 would acquire 22.3 hectares (55 acres) of agricultural land and sever 4 farms.

The estimated construction cost for Alternative N-7, which is 2.7 miles long, is $4.6 million, and it requires 22.3 hectares (55 acres) of new right-of-way.

In summary, the recommended alternative (east Viroqua Bypass Alternatives S-2, C-4, the common segment C-4/C-5 and the Westby Bypass Alternative N-4) provides the best long-term transportation service for the Vernon County Region and the Westby and Viroqua communities. It also provides the best balance among social, economic, and natural resource impacts. This alternative received the most support as a result of the public hearing, and was not opposed by state and federal review agencies based on their comments on the Draft EIS.

Measures to Minimize Harm

Avoid and Minimize Wetland Impacts

The Build Alternatives were developed to minimize wetland impacts where practicable. During the project's engineering phase, WisDOT will investigate additional measures such as steepening roadway sideslopes to minimize wetland impacts. In addition, erosion control and stormwater management measures will minimize wetland impacts.

Wetland Compensation

Compensation for unavoidable wetland loss will be carried out in accordance with the WisDOT/DNR *Cooperative Agreement on Compensatory Wetland Mitigation*.

The WisDOT La Crosse District Office has conducted a search for potential wetland mitigation sites in the vicinity of the US 14/61 project corridor (*Potential Wetland Mitigation Sites, US Highway 14/61 Corridor Study, Westby-Viroqua, February 29, 2000)*. The report provides information on wetland mitigation possibilities including on-site restoration that involves re-establishing wetlands in areas that have been converted to other uses through ditching or other drainage alterations, creation of new wetlands, and debiting wetland loss to an established wetland bank.

An area encompassing about 440 square kilometers (170 square miles) was reviewed either through maps or field reconnaissance. There were no candidate restoration sites within a 4-kilometer (2.5-mile) radius of the project corridor. Eleven candidate restoration sites outside this distance were identified and evaluated for suitability (hydric soils, hydrologic characteristics, surrounding land use, size, and other factors). Of the 11 sites, 5 were ranked "poor" and 6 were ranked "fair" in terms of restoration potential and suitability. In general, the report concluded that wetland restoration is not the preferred compensation method. The candidate restoration sites are too far away from the project corridor to be considered

"near-site. " Most are too large to be a reasonable expenditure of funds for the relatively minor project wetland impacts. Most do not have ditches or other structures that could be altered to restore wetland hydrology, and most are located in floodplains where sediment deposits during flooding could cover up the newly established wetland vegetation. Further, many of the sites are used for agricultural production, have multiple owners, and would not likely be available on a willing seller basis.

Although it would be possible to create wetlands at a location near the project corridor, given the lack of hydric soils and naturally occurring wetlands in the vicinity, it is unlikely that created wetlands would retain hydrophytic vegetation and other wetland characteristics in the long term. In addition, the cost to create a sustainable wetland would likely be high in view of the relatively minor project wetland impacts.

Therefore, it is recommended that wetland compensation be done at an established wetland bank site. The closest wetland bank is the Bell Center Site near Petersburg in Crawford County, approximately 29 kilometers (18 miles) south of the USH 14/61 south project terminus. The Bell Center Site is within the same floristic province and watershed as the project corridor. The variety of wetland types being established at this site would provide comparable functions and values to the wetlands affected by the USH 14/61 project. Because the project will not likely be constructed before 2010, other wetland bank sites closer to the project corridor could be established by that time. WisDOT will continue to monitor this situation during a future engineering design phase that will include permit applications.

Wetland Finding

Based on the above considerations in accordance with Presidential Executive Order 11990, *Protection of Wetlands*, it is determined that there is no practicable alternative to the proposed construction in wetlands and that the proposed action includes all practicable measures to minimize harm to wetlands that may result from such use.